



To: SLCP Team

From: Harvey Chan, FLA Chief Accountability and Innovation Officer

Date: December 21, 2017

Re: Public Consultation

Thank you for the opportunity to participate in the SLCP public consultation. According to the SLCP, it has developed an “assessment framework” that “includes a standard-agnostic tool and verification methodology which collects objective social and labor data that stakeholders can use to identify opportunities for improvement and track progress.” The Fair Labor Association (FLA) supports any efforts that strengthen social auditing, enhance consistency in reporting standards, and increase transparency. We all recognize the problems posed by duplicative efforts and repeated audits of the same factories, while insufficient resources are devoted to addressing the problems that those audits identify. We therefore welcome the SLCP’s aim to reduce this duplication by creating a shared pool of data to use in company assessments. Harmonizing data collection is long overdue and we believe that such an initiative has the potential to free up scarce resources and reduce auditing burdens for companies and suppliers alike. However, achieving these goals and, more importantly, advancing better outcomes for workers, will require that the SLCP meet the following conditions:

1. **The ultimate goal must be upholding high labor standards.** The SLCP uses a standard-agnostic methodology to collect data from manufacturers on working conditions without judgment. Although it is repeatedly referred to as an “assessment framework,” it does not evaluate factory performance against agreed-upon labor standards as an assessment generally would. Instead, the SLCP verifies the accuracy of data that can subsequently be used to assess performance against whichever standard a company may select “to identify opportunities for improvement and track progress.” For example, the data gathered may reveal that factory workers are on the job 90 or more hours in a week, but the framework does not offer any standard for whether this is acceptable. This approach facilitates universal adoption of the tool, but relies on subsequent assessment against varying standards to raise the bar for performance. We believe raising worker rights standards and performance metrics across the industry and holding industry accountable to those standards are essential to achieving meaningful impact. Brands and retailers have made progress in recent decades to improve the working conditions in their supply chains. In part this has been due to efforts like those of the FLA, which hold companies accountable to high standards on behalf of workers and reward those who are leading the way. The SLCP can help advance this progress by consolidating auditing expenses, allowing companies to redeploy resources to remediating the problems audits reveal. However, if convergence in auditing efforts is not accompanied by convergence around the highest labor standards, the SLCP risks undermining rather than advancing this progress.

2. **The data must be sufficiently comprehensive to enable assessment against a range of possible standards.** We were glad to share our comprehensive assessment tool, the Sustainable Compliance Initiative (SCI), with you early in your process and are pleased to see that the current SLCP tool draws extensively on the SCI questions. However, we have identified some areas where the SLCP would not provide sufficient data to assess companies against the FLA standard, including compensation data required to measure workers' pay against living-wage and other benchmarks. See specific gaps and suggestions below in the "Tool" section of our recommendations.
3. **The data must be gathered and verified in a credible way.** Gathering information just once, while efficient, effectively puts all eggs in one basket. Consequently, it is critical that the process for gathering and verifying the data meets the highest standard among current auditing practices. We provide several suggestions below in the "Methodology" section of our recommendations for ways to strengthen this aspect of the SLCP.
4. **The data must be sufficiently transparent.** Transparency is a key ingredient in promoting accountability. Workers benefit most when buyers and factories are held accountable through a process that measures policy commitments against performance, and that is reinforced through transparency. As currently envisioned, the SLCP data will only be available to its industry stakeholders – the brands and retailers operating or considering to operate in a particular factory – who are members of the SLCP and pay for the service. We strongly urge the SLCP to consider making its data available to the public, or at a minimum, to the FLA and other MSI's that can measure and evaluate it against concrete labor standards.

We believe that the SLCP has the potential to help rationalize the current auditing landscape if the above conditions are met. In that spirit we offer a series of more specific technical recommendations below. Please let us know if we can offer additional assistance or insights from our extensive experience auditing manufacturing supply chains.

RECOMMENDATIONS

In general, the SLCP questionnaire is thoughtfully constructed, and with modifications to the questions we suggest below, coupled with a rigorous verification process and a commitment to use the data to support the highest labor standards, it can be a useful tool. Outlined below is the overview of our recommendations for modifications to the verification methodology and the data collection tool to ensure the best outcomes for workers. It is a summary of the key concerns we have highlighted in greater detail in our response to the SLCP survey (see Appendix below).

Methodology

- **Qualifications and Integrity of Verifiers:** The quality and veracity of the data gathered by the SLCP tool will hinge on the qualifications and the integrity of the verifiers implementing it. It is crucial, therefore, that the service providers are adequately trained on soft skills and ethical principles, as well as technical know-how. Rigorous measures must be in place to avoid conflicts of interest and to eliminate sub-standard performers.
- **Duration of the Verification:** Allotting adequate time for verification is crucial for the quality of the output. No matter how comprehensive the tool is, if the verifiers are not given sufficient time to cover all the bases, the effectiveness of the process might be compromised. The stated person-day allotment in the SLCP Protocol might not satisfy this requirement, given the broad scope of the tool. Therefore, the FLA recommends adding person-days for the satisfactory execution of the onsite verification, as quantified in the relevant part of the survey feedback below.

- Worker Interview Sample Size: Worker input is critical for a robust assessment of working conditions, but is typically not adequately incorporated in social compliance audits. The wide range of criteria for sampling laid out in the SLCP Protocol is encouraging in that respect, but the prescribed sample sizes might be inadequate for the desired level of worker input. As detailed in the Survey section below, the FLA recommends a large enough sample size to ensure that a representative group of workers can participate in the verification process.
- Off-site Worker Interviews: The Verification Protocol does not allow for the possibility of off-site worker interviews. We believe this is a flaw. It is essential to train and empower verifiers to conduct interviews outside the premises of the facility if they deem that it is necessary. This is crucial to ensure that input can be elicited in a safe environment for workers.
- Verifier Contact Information for the Interviewees: The FLA recommends that the verifiers provide the interviewed workers with their contact information in case (i) the workers face retaliation from management for their participation in the interviews; and (ii) they have additional, important information they would like to share. Engaging in this best practice increases protection for workers as well as the likelihood that they will speak more freely.
- Inclusion of Worker Representatives/Engagement: The FLA strongly supports the proposal to include worker representatives in the verification process, and the verification of worker engagement efforts by the facility.
- Announced/Unannounced/Semi-Announced: Announced visits have the advantage of fostering a more collaborative and less adversarial auditing environment without sacrificing an assessor's ability to identify areas where a factory may be out of compliance. Conversely, they give a factory more time to prepare documents and provide greater visibility into the management systems. In certain situations, however, a semi-announced or unannounced visit might be necessary (for example, if illegal subcontracting or use of underage workers is suspected). The FLA recommends that second/third parties reserve the right to conduct unannounced/semi-announced verifications and institute a protocol that lays out the criteria for different methods.
- Separation between Service Provider for Joint Assessment vs. Verification: To prevent a conflict of interest, the FLA supports the proposal that a service provider who assisted in the Joint Assessment not be assigned to conduct the Verification at the same facility.

Tool

- Basic, Management System, and Advanced Steps: We note that the tool covers three steps/ levels: Basic, Management System, and Advanced. Certain gaps identified in the Survey (see Appendix below) notwithstanding, the SLCP tool is a comprehensive and useful questionnaire, provided all three steps are included. However, it seems unclear which step will apply to which facility and based on what criteria. An SLCP statement suggests that it will be up to the facility to decide which step will apply. The clarity on steps is important because it will define the comprehensiveness of a verification. The FLA recommends that the tool be used in its broadest version across the board for all Tier 1 apparel and footwear manufacturing facilities, while recognizing that differences in the compliance maturity, size of facilities, and other factors that may lead to different audit methodologies. The stepwise approach might be more suitable for other tiers of the supply chain.
- Basic Needs Wage, Prevailing Wage, and Compensation Data: Compensation is one of the most pressing challenges concerning the wellbeing of workers and their families and is increasingly a focus of civil society organizations, consumers, and investors. While the SLCP tool asks about the sufficiency of wages to meet basic needs, we do not believe a single question on this topic is sufficient to address the depth and breadth of information required to effectively assess the adequacy of compensation. In the absence of detailed guidance or comprehensive benchmarks, it will be virtually impossible for the verifiers and the facilities themselves to assess if the workers' compensation levels meet their basic needs and provide some discretionary income. As a result,

the answers to the one and only question in the tool on the topic are highly likely to be unreliable or to result in a finding of “unable to assess.” On a related note, the notion of “prevailing wage” is missing from the tool. For the FLA and FLA-affiliated brands and suppliers the standard is that “workers receive at least the minimum wage or the prevailing industry wage, whichever is higher.” It is admittedly challenging to establish whether a facility is paying the “prevailing wage,” but this is particularly important in countries where there is no applicable legal minimum wage in the private sector (e.g., Egypt, Republic of Georgia) or where the prevailing wage is significantly higher than the minimum wage. The larger point is that since the tool does not collect wage data, the verifiers or brands will not be able to assess factory’s pay practices against various wage benchmarks. The FLA has developed a compensation data collection tool and methodology for that purpose and would be glad to share it with the SLCP to bridge this gap.

- **Social Insurance:** When assessing legal compliance with respect to social insurance, it is critical to determine if: (i) the facility has enrolled workers in commercial insurance instead of the legally mandated government-run scheme; and (ii) the calculation base for contributions is in line with legal requirements. Facilities and verifiers need to be well informed that using commercial insurance schemes or calculating contributions based on minimum wage (rather than actual wage received) is in violation of the law in most countries.
- **Overtime and Production Planning:** It is essential to inquire if the factory’s production planning is based on working time that is longer than regular working hours (i.e., inclusive of overtime) as this is a common practice and one of the root causes of excessive working hours. Without this information, it will be much harder to address the problem of overtime.
- **Collective Bargaining Agreement (CBA):** While the tool includes questions about whether a CBA is in place at a given facility and whether the provisions of the CBA are in line with legal requirements, there are no questions evaluating the facility’s compliance with the CBA in practice. We recommend the inclusion of questions highlighted in the appended Survey below to close this gap.
- **Progressive Discipline:** The FLA recommends inclusion of a question or questions to determine if the facility has a progressive discipline system in place, whereby disciplinary actions are escalated, moving from verbal warnings to written warnings to suspension and finally to termination.
- **Performance Reviews:** Regular, objective evaluation of workers’ performance is key to a successful management system. It is, therefore, important that the tool digs deeper than asking whether performance is one of the criteria on which the salary is based and asks if the facility has a fair, transparent performance evaluation system that covers all workers.
- **Health & Safety:** The tool lacks any questions related to the presence at the facility of asbestos, and could use more detailed questions on (i) emergency evacuation drills; (ii) confined spaces; (iii) working in heights/fall protection; (iv) eye-wash stations; (v) vehicle/traffic safety; and (vi) radiation/laser safety. FLA’s recommendations for additional questions on these and other topics are provided in the appended Survey below.

In conclusion, we would like to reiterate that the SLCP’s mission of an industry-wide, universal audit tool is a worthy endeavor. Our feedback is intended to strengthen the tool and the methodology, while reminding the various stakeholders of the importance of commitment to standards and accountability. As always, the FLA is happy to provide further input, should the SLCP team request our assistance.

APPENDIX

SLCP Public Consultation Survey

Please see below for the FLA's responses to the Survey.

Please note that for the purposes of reader-friendliness, the responses have been highlighted.

Where additional questions have been suggested, the corresponding FLA benchmark has been provided (e.g., HOW.1, H/A.2). The full list of FLA benchmarks can be found here:

http://www.fairlabor.org/sites/default/files/fla_complete_code_and_benchmarks.pdf

While the FLA worked to provide as detailed a list as possible, the questions recommended for addition, below, are not meant to be exhaustive. Lastly, please note that some of the responses have been deliberately left blank, particularly for those questions where the respondent is asked to rank their satisfaction level.

Social Labor Convergence Project – Public Consultation Survey

STAKEHOLDER INFORMATION

1. Please note that this information will be confidential. We are only asking these questions should we need to follow-up with you to better understand your feedback:

Name of Organization: Fair Labor Association

You Represent: Fair Labor Association

2. Is your organization a signatory of the SLCP?

Yes

No

3. Type of organization you belong to (select the one that best applies):

Brand/Retailer

Manufacturer/Supplier

Agent

Trade union

Civil society organization

Auditing firm/Service provider

Standard holder

Academic

(Inter) Government

Business/Trade association

Multi-stakeholder initiative

Investors

Consultants

Others, namely....

4. Which country is your organization headquartered in?

United States

5. Which country are you located in?

HQ in the United States, with offices in Switzerland and China. Regional staff are located in Guatemala, India, Ivory Coast and Turkey.

6. In case we need to contact you to gather further feedback, do you authorize us to reach you by email?

Yes

No

THE SLCP ASSESSMENT FRAMEWORK AS A WHOLE (all three elements: tool, protocol, verifier guidance)

The following sections of the survey cover three areas in line with the elements of the S&L Converged Assessment Framework-Proto2:

1. The Data Collection & Verification Tool
2. The Verification Protocol
3. The Verifier Guidance

SLCP OBJECTIVES

To create a converged assessment framework that supports stakeholders' efforts to improve working conditions in the global apparel and footwear supply chain.

This project will help the industry to:

- Reduce audit fatigue: avoid duplications and reduce the number of social & labor audits, by replacing current proprietary assessment tools,
- Increase the opportunity for greater comparability of social & labor data
- Redeploy resources towards improvement actions
- Build mutual trust and respect, measure and understand working conditions, and improve those conditions over time.

Not so well Very well

If rated 2 stars or lower, please explain why and how this could be improved:

7. Please rate how well the S&L Converged Assessment Framework (proto2) supports the objectives of the Social and Labor Convergence Project (SLCP) from a scale of 1-5 (5 being "Very well"; 1 being "Not so well")

SECTION 1: THE DATA COLLECTION & VERIFICATION TOOL (element 1)

The Social & Labor Convergence Project (SLCP) aims to bring together unique perspectives to create an efficient, scalable and sustainable solution for social audits. The SLCP seeks to develop a simple, unified and effective industry-wide assessment framework, which

- Is descriptive – standard agnostic and judgment free
- Collects relevant and essential social & labor data
- Assesses objectively social & labor conditions

CONTENT/QUESTIONS - THE DATA COLLECTION AND VERIFICATION TOOL (PROTO2)

8. Please rate your overall satisfaction with the content/questions in the Data Collection and Verification Tool - Prototype 2 (Excel file) from a scale of 1-5 (5 being "Very Satisfied"; 1 being "Very Dissatisfied")

9. Were there any questions missed that we should consider for each of the following sections? (check all that apply)

Note: For sections selected, please describe the question(s) you would want to see and its intent with respect to improvement of the social and labour conditions or compliance purposes. See comment box below.

- **Facility Profile**
 - What percentage of production workers are working on a piece-rate compensation system?
 - Special social compliance/CSR projects that the factory is involved in (e.g., Better Work)
 - Are there any confined spaces in the factory? (Note: This might be a helpful conditionality trigger.)

- **Recruitment and Hiring**
 - Is there any evidence of a worker paying an introduction fee to another worker? (ER.5)
 - Is there a written job description prepared for all positions when personnel need to be hired? (ER.1)
 - Does the facility keep workers' health information confidential? (ND.11)
 - Are employment terms (on the contract) voluntarily agreed to by workers? (ER.5, ER.10)
 - Are the workers charged for swipe cards, ID/badges or uniforms? (ER. 5, ER.6, ND.3)
 - Performance Reviews:
 - There is a question as to whether wage is based, among others, on “performance” but there is no question asking, “Does the facility conduct performance reviews for all workers?”. It would be useful to pose the question directly/explicitly and with the follow-up questions below:
 - Does the review and evaluation process assess performance objectively? (ER.29)
 - Do workers have access to their evaluations and the right to provide feedback on them? (ER.29)
 - Are performance reviews documented in writing? (ER.29)
 - Are demotions/reassignments carried out in a fair and transparent way? (ER.30) (Note: “Demotion” is not mentioned in the tool at all.)
 - Are contract/contingent/temporary workers given priority when the factory is seeking new permanent workers? (ER.11)
 - Comment: For “Other” forms of discrimination, it would be useful to provide possible options (e.g., marital status, criminal record, etc. Also, “sexual orientation” appears inconsistently in discrimination-related questions.
 - Comment: FLA recommends inquiring as to “what is the maximum length of the probation period?” (C.3) While payment of legal minimum wage for probationary workers is important, it is also important that the workers are not subject to excessively long probationary period. FLA limit is 3 months.

- **Working Hours**
 - Comment: While the specific content of Working Hours procedures might be too advanced for the purposes of this tool, here are topics that might be useful to consider:
 - The facility’s shift schedule
 - Circumstances under which overtime is allowed
 - Criteria to determine how much overtime is allowed
 - Types/categories of unusual business circumstances
 - Communication process to workers and service providers about unusual circumstances
 - Payment system under unusual business circumstances
 - Timing and duration of breaks
 - Timing of rest days
 - Conditions under which workers can refuse overtime
 - Steps for workers to file complaints regarding forced overtime
 - Steps for management to ensure there is no retaliation against any worker refusing overtime

- Special working hour provisions for protected categories of workers (HOW.4)
 - Does the working hour system maintain documentation on women workers and workers under the age of 18 entitled to legal protections? (HOW.5)
 - If the factory calculates regular hours as an average over a period of longer than one week, does the basis for this calculation exceed 48 hours? (HOW.7)
 - If the factory calculates regular hours as an average over a period of longer than one week, does it have official permission from the relevant authorities? (HOW.7)
 - Does the factory production plan always include overtime (e.g., planning exceeding 48 working hours/week as the standard working time)? (HOW.8)
 - Does factory management set production targets, piece rates, or any other incentive or production system at a level such that workers need to work beyond regular working hours? (HOW.6)
 - If either law provides for it (e.g., as in Brazil, Turkey) or with workers' consent, do workers take compensation leave for previously worked overtime? (HOW.1)
- **Wages and Benefits**
 - **General Comment:** FLA standard is that “workers receive at least the minimum wage or the prevailing industry wage, whichever is higher.” It is admittedly challenging to establish whether or not a facility is paying the prevailing wage, but FLA recommends that it be taken into consideration. This is particularly important in countries where there is no applicable legal minimum wage (e.g., Egypt, Republic of Georgia) or where the prevailing wage is significantly higher than the minimum wage. Since the tool does not collect wage data, the verifiers or brands will not be able to assess it subsequently.
 - **Loan/Advance Payment:** FLA tool has the following question: “Does the factory advance wage payments by more than three months or in excess of the legal limit, (whichever is less)? (ER.20)” While three-month limit is an FLA standard, the question can be rephrased to reference applicable legal limits. Also, the SLCP tool only inquires “Does the facility loan money to employees?” and if so, “describe the circumstances”. Recommended follow-up questions:
 - Does the facility communicate the rules regarding advances to workers?
 - Does the facility communicate the rules regarding how the workers pay back the advances?
 - Does the facility document that an advance payment has been issued?
 - Does the facility confirm receipt and accuracy by the worker in writing?
 - Does the management give workers access to full information concerning the status of relevant accounts and payments to these accounts in case of voluntary wage deductions? (C.12)
 - **Comment:** There is a question regarding whether the severance pay follows legal requirements, but FLA recommends adding the following to ensure the tool captures all relevant information:
 - Does the factory maintain documents used to manage or track the administration of termination payouts and packages? (ER.2, ER.32)
 - If required by law, does the factory provide timely termination payouts regardless of the timing of payroll? (C.1)
 - Is the receipt of all compensation confirmed by the relevant worker in writing? (C.14, C.15)
 - In cases where wages are received by a third party, has the worker authorized this in writing? (C.14)
- **Employee Treatment**
 - Do the disciplinary rules, procedures and practices embody a progressive discipline system through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination? (ER.27)
 - Do the disciplinary procedures include the requirements to record and file all warnings and disciplinary actions? (ER.27)
 - If the factory security personnel carry weapons, is this allowed by local law? (H/A.1)

- Did every worker receive a copy of the workplace rules during orientation? (ER.15)
 - Do the grievance procedures allow a direct settlement of the grievance by the worker and the immediate supervisor? (ER.25)
 - If direct settlement with the supervisor is inappropriate or has failed, are there options for senior management review? (ER.25)
 - Does the content of training for supervisors and production managers on grievance system include the principle of non-retaliation against workers who make complaints? (ER.25)
 - Is there any evidence that managers react in an unfair way to complaints or grievances? (ND.1)
 - Is there any evidence that managers react in an arbitrary or discriminatory manner to complaints or grievances? (ND.1)
 - Does the factory maintain documentation in relation to grievance processes? (ER.2)
- **Employee Involvement**
 - **Comment:** For question MS-1.10 (topics included within written policies & procedures for freedom of association and collective bargaining), FLA recommends inclusion of the following:
 - Policy: If the right to freedom of association, strikes and collective bargaining is restricted under law, employer's commitment to not obstruct legal alternative means of workers association
 - Policy: The right of workers to participate in strikes (consistent with ILO principles and jurisprudence)
 - Does the facility use the threat or the presence of the military or police to prevent, disrupt, or break up peaceful organizing activities? (FOA.14)
 - Does the facility interfere with government registration decisions, procedures and requirements regarding the formation of workers' organizations? (FOA.12)
 - Does management comply with all relevant provisions where national laws provide special protection to workers/worker representatives engaged in a particular union activity?
 - Does management provide any office space or other facilities for the union(s) or other worker representative structure(s)? (FOA.15)
 - If there is more than one union/another worker representative structure in the factory, does management provide the same benefits, opportunities, and treatment to them? (FOA.13)
 - Does management provide any allowance or special benefits to officers or leaders of the union(s) or other worker representatives to make sure that they're not disadvantaged because of their daily union/representation duties? (FOA.13)
 - In cases where there is a union, does management engage in collective bargaining with representatives of unorganized workers? (FOA.18) [Note: FLA benchmarks stipulate that employers can only engage in collective bargaining with representatives of unorganized workers when no workers' organizations exist.]
 - Does management ensure that minority unions have the means for defending the occupational interests of their members, within limits established by applicable law? (FOA.21)
 - **Comment:** While the tool has questions as to whether there is a CBA and whether the provisions of CBA are in line with legal requirements, there is no question on facility's compliance with the CBA:
 - Does management comply with the terms agreed upon in the collective bargaining agreement? (FOA.19)
 - Are there any inconsistencies between the collective bargaining agreement and workers' individual employment contracts? (FOA.19)
 - Have all workers been provided a copy of the collective bargaining agreement? (ER.16)

- Has management threatened to shift production or close the workplace site in an attempt to prevent union formation or in reaction to formation of a union, or any other legitimate exercise of the right to FOA and collective bargaining? (FOA.8)
- Has management offered or used severance pay in any form or under any other name as a means of contravening the right to freedom of association? (FOA.9)
- Has management reinstated workers who have been unjustly dismissed, demoted or otherwise suffered loss of rights and privileges due to an act of anti-union discrimination? (FOA.6)
- **Health and Safety**
 - Do the procedures provide the following information
 - Standard Operating Procedures (SOPs) for each job with a focus on performing the job safely? (ER.31)
 - Measures to protect the reproductive health of workers through minimizing exposure to workplace hazards? (HSE.12, ND.8)
 - Steps for workers to raise health and safety concerns (ER.31)
 - Protection against retaliation for workers who raise health and safety concerns? (ER.31)
 - Do the chemical storage areas have measures to prevent unauthorized entry? (HSE.5)
 - **Comment:** The tool doesn't contain questions regarding "asbestos" and related hazards. Following questions are covered in the FLA SCI tool:
 - Has the factory performed an asbestos exposure assessment?
 - Has the factory taken the proper steps to ensure that workers are not exposed to asbestos? (HSE.9)
 - Are the materials containing asbestos/asbestos exposure areas labeled as such? (HSE.9)
 - Are workers able to refuse to work under unsafe conditions? (HSE.16)
 - Have workers who refused to work in unsafe conditions ever faced any negative consequences? (HSE.16)
 - If lifting equipment is not intended for human transport, are there signs stating so? (HSE.14)
 - Is lifting equipment inspected annually or more often if required by the local government or the manufacturer? (HSE.14, HSE.1)
 - Does management take protective measures for workers with hearing loss? (HSE.7, HSE.8)
 - Can workers take short ergonomic breaks during the work day? (Best Practice)
 - Are the ventilation and/or heating systems properly maintained? (HSE.13)
 - **Comment:** The tool has the following question on vehicle/traffic safety: "Is onsite vehicle traffic regulated for safety, including ensuring only authorized people are driving onsite?". FLA recommends adding the following (either as Dropdown options or More Info):
 - Vehicles are driven at an appropriate speed,
 - Traffic lanes and walk paths are clearly marked
 - Vehicles are in good working condition
 - Only authorized, trained and qualified people drive vehicles
 - Vehicles are used for purposes for which they're intended and designed
 - Factory provides visual management such as indicators, convex mirrors in dead ends, reflectors, etc., to ensure safe driving practices on factory premises. (HSE.1)
 - **Comment:** The tool has two broad questions regarding radiation/laser safety. Following questions would be helpful in ensuring more thorough assessment of the topic:
 - Does the radiation/laser equipment have the appropriate protection? (HSE.14)
 - Does the radiation/laser equipment have the appropriate signs? (HSE.14)
 - Are workers working with radiation sources protected and not exposed to more than three rems/year? (HSE.7)

- Do workers that work with radiation-producing/laser equipment understand why and how to operate the equipment safely? (HSE.14)
- Are electrical problems fixed in a timely manner? (HSE.13)
- When equipment with electrical problems is identified, is it immediately removed from service until properly repaired, as required by local law? (HSE.13)
- **Comment:** There is only one, broad question concerning “confined spaces”. Following questions would be helpful in ensuring more thorough assessment of the topic:
 - Does each confined space have signs indicating it as such? (HSE.13)
 - Does each confined space have the appropriate protections to ensure no accidental entry? (HSE.13)
 - Does each confined space have authorized entry-only access? (HSE.13)
 - Do people that enter confined spaces do so only when appropriate measures have been taken to protect them from any physical hazards present? (HSE.13)
 - Do people that enter confined spaces do so when the atmosphere is safe and the air has been tested when needed? (HSE.13)
 - Do the workers who enter the confined spaces know and understand how to do so safely? (HSE.13)
 - Is rescue equipment ready for use? (HSE.8)
- **Comment:** There are no questions regarding “fall protection”. FLA’s SCI tool has the following questions on the topic:
 - Does the factory have areas where fall protection is needed? (HSE.7, HSE.8)
 - Do workers use fall protection when needed? (HSE.7, HSE.8)
 - Is the fall protection equipment in good condition?
 - Is the fall protection equipment removed and/or repaired when needed? (HSE.14)
 - Do high working areas have walls, fences, or other barriers, or do workers wear fall protection at all times when working in these areas? (HSE.13)
- Are fire risks assessment results considered and addressed properly? (HSE.5)
- Are the following fire-fighting equipment inspected monthly
 - Hoses, nozzles, fire pumps
 - Firefighting PPE
 - Firefighting Vehicles
 - Tools, incl. axes, saws, hammers
 - Communication devices? (HSE.6)
- Is there a system in place to account for all workers during an emergency evacuation? (HSE.5)
- Which of the following aspects are included in the emergency drill?
 - It is unannounced
 - Every worker evacuates
 - Workers meet at assembly/meeting points
 - All power is turned off
 - Doors and windows are closed
 - There is a check to ensure all workers have properly evacuated
 - Monitors are present to listen and watch to ensure all alarms work properly and all workers are evacuated as planned
 - There is an assessment after the drill to learn how to improve the evacuation process
 - Record keeping of the drill (HSE.5)
- Is the contact information for medical response located near each phone, or otherwise throughout the factory? (HSE.6)
- **Comment:** The following additional questions are recommended to ensure that eye-wash stations serve their intended purpose:

- Are the eye-wash stations
 - Clearly identifiable
 - Easy to access
 - Clear of clutter/debris
 - Using potable water at the right temp and pressure
 - Inspected at least monthly? (HSE.6)
 - If factory is located in multiple-floor building, with different owners, does management coordinate the fire safety concerns/risks with the other companies? (HSE.5)
 - Is there a sanitary way to dry hands after washing? (HSE.19)
 - Does the factory make appropriate efforts to communicate its health and safety program to all migrant workers, or other workers who may speak other languages and come from other cultures? (ER.16)
 - Is PPE the correct size for the workers? (HSE.7)
 - Does the factory track all illnesses? (HSE.1, HSE.3)
 - **Termination:**
 - **Comment:** The tool has a question on whether the facility has experienced retrenchment due to extraordinary business circumstances, but it is recommended that follow-up questions be asked to better assess the facility's practices:
 - If the factory had this type of experience, did the management take any measures to assist or protect its workforce? (ER.32)
 - Did the management fully consider all possible alternatives to layoffs? (more than one answer possible)?
 - Before considering layoffs, management fully analyzed possible alternatives internally.
 - Management discussed the situation with its shareholders to find alternatives.
 - Management asked an external consultant to analyze if layoffs could be avoided. (ER.32)
 - Did the management consult the worker/union representatives about the alternatives to avoid temporary/permanent layoffs or retrenchment? (ER.32)
 - **Management Systems**
 - **Comment:** Training & Communication questions do not explicitly include Recruitment, Hiring & Personnel Development (ER.1, ER.29, ER.30) or Termination & Retrenchment (ER.17)
 - Are personnel files and relevant employment information for contract/contingent/temporary workers maintained and accessible? (ER.11)
 - **Comment:** There is a single question regarding review of policies and procedures (with options for sources of information). It would be useful to break it into parts for Wages & Benefits, Recruitment & Hiring, etc. to ensure all topics are covered.

Not Applicable/None Missing

For sections selected, which questions? Please describe:

10. Were there any questions that were unclear or could benefit from further clarification for each of the following sections/areas? (check those that apply)

- Facility Profile
- **Recruitment and Hiring**

- While various forms of discrimination are covered in the tool in relation to job description, conditions of work, etc., it would still be useful to ask if personnel files include any information regarding race, gender, religion, etc.
- Question concerning medical fee deduction is conditional upon the answer “Recruiter” or “Facility & Recruiter” but it is possible for “Facility” alone to charge this fee.
- **Working Hours**
 - WH-13.2 “Are weekly rest days at least 24 hours?” We recommend revising it as follows: “Are weekly rest days at least 24 consecutive hours?”
- Wages and Benefits
- **Employee Treatment**
 - **Comment:** The question “Is employee access to dormitories unrestricted outside the working hours”? implies that access can be restricted during working hours. (F.6)
- Employee Involvement
- **Health and Safety:**
 - **Dormitories:** For the question on “Accommodations meet minimum space requirements”, it is recommended to provide international standards as many countries do not have local requirements. Alternatively, question can be revised (in an agnostic way) to ask for the number of occupants and the square footage of the livable space (excluding toilets, balcony).
- Termination
- Management Systems
- **"More Info" Boxes**
 - If not covered already, it would be useful to list special categories of workers:
 - International migrant workers
 - Domestic migrant workers
 - Temporary workers
 - Juvenile workers
 - Home workers
 - Trainees/apprentices/interns
 - Pregnant/lactating workers
 - Workers with disabilities/chronic illnesses
 - Non-production related workers
 - Workers under probation

Not Applicable

For sections selected, which question? Please describe:

11. Were there any questions that were redundant/inappropriate for each of the following sections/areas?

(check all that apply)

Facility Profile

Recruitment and Hiring

Working Hours

Wages and Benefits

Employee Treatment

Employee Involvement

Health and Safety
Termination
Management Systems
"More Info" Boxes
Not Applicable

12. SLCP proto2, 1. Data collection & verification tool. Section (tab) Employee Involvement (worker engagement)

Several elements on worker engagement have been included in the tool. These cover among others Freedom of Association (separate questions on Unions and Worker Committees), Grievance Mechanism and pro-active worker engagement (through worker surveys, town hall meetings, team meeting etc.). Please find these under the tab Employee Involvement.

Survey Question: Do you feel the element of worker engagement is sufficiently addressed in the tool questions (see tab "Employee Involvement")?

Yes, worker engagement is sufficiently addressed

No, worker engagement is not sufficiently addressed. Please explain:

Any comments regarding your answer selection?

Comments: Additional questions recommended by FLA have been listed under Survey Question no. 9 above.

13. SLCP proto2, 1. Data collection & verification tool. Verification tabs: Summary Report

The tool includes an Accuracy Index: A % of questions that were accurate based on those answered. The purpose of the index is to demonstrate to both facility and users the deviation between the data collected by the facility and the verified data. It is not to "rate" the facility but simply to understand how much information the verifier had to alter.

Survey Question: Do you agree that the accuracy index is a useful tool to have?

Yes, it is useful

No, it is not useful

14. Any Other Comments related to content/questions? (You may skip this question or answer those that apply)

▪ Instructions:

- Typo: "Graphical location" should be corrected as "Geographical location".

Facility Profile

Recruitment and Hiring

Working Hours

Wages and Benefits

Employee Treatment

▪ Employee Involvement

- If the tool design allows, it would be useful to prepopulate certain answers regarding freedom of association for countries where the legal framework is not compatible with the ILO principles on Freedom of Association (e.g., China, Vietnam).

Health and Safety
Termination
Management Systems
"More Info" Boxes

15. How helpful or unhelpful do you find the “More Info” guidance boxes provided in the tool?

Not helpful / Neither helpful nor unhelpful / Somewhat helpful / Very helpful

Please provide feedback on your response and, if applicable, where we can improve:

16. Which questions in the data collection & verification tool (element 1 under SLCP converged assessment framework proto2) specifically require (better) guidance/’more info’? (check those that apply)

Facility Profile
Recruitment and Hiring
Working Hours

- **Wages and Benefits:**
 - **Basic Needs (WB-14):** In the absence of detailed guidance/benchmarks, it will be very difficult for the verifiers and the facilities themselves to assess if the workers’ compensation level is sufficient to meet their basic needs and provide some discretionary benchmark. As a result, the answer is highly likely to be unreliable or “Unable to assess”.
 - **Leave:** While there are questions regarding legal compliance with leave in the data collection tool, it is important that the verifier inquires with workers as to whether they experienced any undue restrictions, discrimination, unfair treatment when trying to take leave (HOW.12, HOW.13, HOW,15, HOW.17, ND.1).
 - **Social Insurance:**
 - It is important that commercial/private insurance is not treated as legal compliance in countries (e.g., China) where law mandates participation in a government-run program.
 - Facilities and verifiers should also take “contribution calculation base” into consideration. Facility should not be treated as legally compliant if the contribution base used is legal minimum wage when the law requires the use of actual salary.
 - It would be useful to instruct facilities and verifiers to provide coverage breakdown by insurance type when it is less than full.
 - **Pay slip items:** To ensure consistency across results, it would be helpful to provide a list of items expected at the minimum: Base wage, total hours worked, OT hours worked, bonuses/allowances, etc.
 - **Minimum Wage Information:** Since the verification covers a 12-month period, there might be more than one applicable minimum wage.

Employee Treatment
Employee Involvement
Health and Safety
Termination
Management Systems
"More Info" Boxes
Not Applicable

For sections selected, which question(s)? Please provide section, question number, and describe how this could be improved:

17. Any general comments or feedback specific to the content/questions used in the Data Collection and Verification Tool - Proto 2 (element 1 of the SLCP converged assessment framework)?



OBJECTIVES - THE DATA COLLECTION AND VERIFICATION TOOL (PROTO2)

18. How well does the Data Collection & Verification Tool - Proto2 (element 1 under SLCP Converged Assessment Framework proto2) meet each of the following objectives? (Well / Not so well)

Is a simple, unified and effective industry-wide assessment tool
If “Not so well”, please describe how this could be improved:

Is descriptive – standard agnostic and judgement free
If “Not so well”, please describe how this could be improved:

Collects relevant and essential social & labor data
If “Not so well”, please describe how this could be improved:

Assesses objectively social & labor conditions
If “Not so well”, please describe how this could be improved:

Will help eliminate audit fatigue
If “Not so well”, please describe how this could be improved:

Increases the opportunity for greater comparability of social & labor data
If “Not so well”, please describe how this could be improved:

If other, please describe
If “Not so well”, please describe how this could be improved:

19. Is there a missing element from the Data Collection and Verification Tool-Proto2 that would help drive buy-in?

No
Yes

Please explain the missing element and describe its value with respect to improvement of the social and labour conditions or compliance purposes:

20. Any general comments or feedback specific to objectives of the Data Collection & Verification Tool-Proto2 (element 1)?

Keyword search function does not seem to work on the Excel tool. For users not well-acquainted with the tool, it would be helpful to fix it so that they can locate a question with ease.

21. How satisfied or unsatisfied are you with the Data Collection & Verification Tool (element 1 under of the converged assessment framework)?

Very Dissatisfied / Somewhat Dissatisfied / Neither Satisfied nor Dissatisfied / Somewhat Satisfied / Very Satisfied

Please explain your selection and describe your recommendations and/or priority for improvement in the next iteration of the data collection & verification tool:

22. Are there any last comments or feedback you would like to share with the SLCP Public Consultation team for consideration ahead of the next version of the Data Collection & Verification Tool (Proto2)?

There are three levels of questions: (i) Basic, (ii) Management Systems, and (iii) Advanced. It seems it has not yet been established which level will apply to which type of facility. FLA recommends keeping the scope of the tool as comprehensive as possible to get a more holistic understanding of the facility's labor practices regardless of size, compliance maturity or other criteria.

Also, the structure of the SLCP tool might make it difficult to track some of the management systems related issues. For example, a question asks which topics are covered in the trainings for production workers, and another question asks whether the trainings are for new recruits or they're also provided on an ongoing basis to all workers. It is possible that a certain topic is covered only in the orientation while another topic is included in ongoing trainings, but it will be difficult for the verifier to keep track of which topic falls under which type of training. If the design of the questionnaire cannot be modified, it would be useful to train the facilities and verifiers to ensure that information is captured accurately.

SECTION TWO: VERIFICATION PROTOCOL (element 2)

This verification protocol aims to specify procedures and process requirements regarding the verification (stage 2 in the SLCP assessment process). The objective of the SLCP verification process is to verify and ensure the integrity and accuracy of the data collected through the tool and reported by facilities (stage 1 in the SLCP assessment process)

CONTENT - VERIFICATION PROTOCOL

23. Please rate your overall satisfaction with the content of the verification protocol:

Very Dissatisfied / Somewhat Dissatisfied / Neither Satisfied nor Dissatisfied / Somewhat Satisfied / Very Satisfied

If rated 2 thumbs or lower, explain why and how this could be improved:

24. Is anything missing that we should consider for each of the following sections? If yes, please describe the intent of the content you would want to see added with respect to improvement of the social and labour conditions or strict compliance purposes

(Yes / No)

Request for verification

If yes, please describe

Pre-verification communication and submission

If yes, please describe

Offsite review

If yes, please describe

On site verification

If yes, please describe

Comment: In addition to the onsite interviews, FLA recommends that the Protocol make room for the possibility of off-site interviews. Despite a private setting, there might be limitations to what a worker is willing to share when the interview takes place on the facility premises. When a verifier deems it warranted, s/he should be empowered to pursue off-site interviews with the workers to elicit more reliable information.

Also, FLA recommends that the verifiers provide their contact information to interviewees in case they need to report a complaint (e.g., retaliatory practice).

Reporting

If yes, please describe

25. Were there any points that were unclear or could benefit from further clarification for each of the following sections/areas?

(Yes / No)

Request for verification

If yes, please describe

Pre-verification communication and submission

If yes, please describe

Offsite review

If yes, please describe

On site verification

If yes, please describe

Reporting

If yes, please describe

26. Any other comments related to content?

Comments:

27. SLCP Proto2, 2. Verification Protocol: Section 1, Self Assessment/Joint Assessment, Page 2

The data collection can be either done by self-assessment (SA) by facility (only) or a joint assessment (JA) (facility + external assistance). On each occasion, even if the external party is a SLCP approved verifier, the data must be verified by an(other) SLCP approved Verifier.

Rationale: The SLCP assessment is a lengthy tool. Signatories understand that it may take a while for facilities to become comfortable with the tool and seek assistance in completion (Joint Assessment) As such means are provided for good quality information as they learn how to complete the assessment tool. In order to avoid conflict of interest and create a clear separation between the initial assessment and the verification, these cannot be combined.

Survey Question:

Do you support the separation between Joint Assessment and Verification?

Yes, I agree that on each occasion, even if the external party is a SLCP approved verifier, the data must be verified by an(other) SLCP approved Verifier.

No, if carried out by an SLCP approved Verifier, the data collection and verification can be combined

Comments: FLA supports the separation between the external party involved in the Joint Assessment and the external party conducting the Verification.

28. SLCP Proto2, 2. Verification Protocol: 4, Eligibility of Verifiers, Page 3

Only SLCP approved Verifiers can produce a valid verified assessment report.

Approved verifiers:

- Verifiers can belong to a 2nd or 3rd party organization (2nd party organization is one with which a facility has a buying relationship).
- May belong to either brands, retailers, manufacturers, agents/licensees, NGOs, service providers (note that Verifier management process is under development).
- Have undergone the prerequisite training and approval process as determined by the appointed Verification Program Management Organization (VPM) and the SLCP.

Rationale: Signatories have emphasized that it is the quality of the individual verifier that matters not the organization to which the individual belongs. To aid with scale and to facilitate adoption, it is also beneficial to include Verifier from originations other than 3rd party bodies (service providers/audit firms).

Survey Question:

Do you agree that qualified verifiers belonging to 2nd party organizations should be allowed to carry out verification as long as they fulfill the criteria as stipulated by the project?

Yes, I agree

No, I do not agree

For any answer selected, please explain the rationale for supporting this option

Comment: Given the crucial role played by buyers in ensuring compliance, excluding them from the verification process would be ill-advised. Also, allowing buyer representatives to act in verifier capacity might help build trust between brands as they begin to rely on each other's verifications. That said, it is important that second party verifiers have the necessary skills and experience to carry out these verifications. Also, safeguards are required to prevent conflict of interest whereby, for example, a second party verifier is more lenient toward a strategic buyer or his/her judgment is colored by matters not directly pertaining to labor practices (e.g., quality, timely delivery of merchandise).

29. SLCP proto2, 2. verification protocol, section 5.1 On-site Verification Planning, page 5

During the pilot, on-site verifications will be announced. Therefore, in planning, the verifier must consider local/national holidays as well as any specific dates that the facility will be unavailable for verification.

Rationale: The reason the visit will be announced is that this is a verification and not an audit. Announced verification supports the collaborative approach that this project is based on. It gives the industry an opportunity to reset the relationship between brands/retailers/agents and manufacturers by focusing on providing openness and data integrity. Moreover, it allows the facility to plan for having the responsible persons (such as HR-manager) to be on site for being available for interviews and having access to the required documents for review.

Survey question:

Do you support the proposal of announced visits for on-site verification?

Yes, I support proposal of announced visits on-site verification visits

No, I do not support the proposal of announced on-site verification visits

I would prefer semi-announced visits with a 30-day window and block out days

I would prefer semi-announced visits with a 10-day window

If selected "No, it's too short" or "too long", please explain rational for supporting this option.

Please also provide an alternative to the days on-site proposed and explain why.

Comments: Announced visits have the advantage of fostering a more collaborative and less adversarial auditing environment. They're also logistically easier to manage. That said, in the case of certain situations, a semi-announced or unannounced visit might be justified (for example, if use of undocumented or underage workers is suspected). FLA recommends that SLCP reserve the right to conduct unannounced/semi-announced verifications and institute a protocol that lays out the criteria for different methods.

30. SLCP proto2, 2. Verification Protocol, Section 5.3, Verification Length, Page 7

The table below provides an estimated minimum number of man-days to carry out on site verification work according to the size of the facility. Verifiers are to follow the guidelines indicated below on the minimum length requirements for the verification of the assessment data. [SEE TABLE ON PAGE 7 OF VERIFICATION PROTOCOL]

Rationale: The tool is an in-depth assessment of social and labor issues in a facility. In order to carry out a thorough verification of such a lengthy tool and to ensure Verifiers are not rushing through the process.

Survey Question:

Do you agree with the proposed number of days on site?

Yes, I agree the proposed number of days is sufficient

No, it is too short

No, it is too long

Comment: Given the breadth of the tool, it is crucial that the duration of the visit is long enough to cover all the bases without rushing the process. If verifiers are not provided adequate time, it might compromise the quality of the output.

For example, based on SLCP's own guidance, in a facility with 150 workers, the verifier is expected to conduct at least 8 individual interviews and a total of 14 interviews (including group interviews with 3-4 person per group). Given SLCP's own time estimate, this would translate to at a minimum 3-3.5 hours spent on worker interviews alone in a 2-person day visit.

Here is the Team Formation Guidance FLA uses:

1-999 workers: 2-person team for 2 days onsite (a total of 4 person days)

1,000-2,499 workers: 3-person team for 2 days onsite (a total of 6 person days)

2,500-4,999 workers: 3-person team for 2.5 days onsite (a total of 7.5 days)

Assuming the SLCP verification will replace multiple individual brand audits in a given facility, the extra time spent would be worth the additional effort and cost.

Also, FLA recommends a 2-person team for even small facilities as it has certain advantages: (i) auditors might have complementary skills (e.g., HSE or Accounting expertise); (ii) a male/female duo would help with the division of labor for male/female worker interviews; (iii) two auditors can have each other's back in case of safety risk, ailment or other unforeseen circumstances.

31. SLCP proto2, 2. Verification protocol. Section 5.3, Recommended Sample Size, Pages 10

Below, you will find the Recommended Sample Size table provided to Verifiers during the pilot process demonstrating the minimum number of interviews, sampling of personnel files and wage and working hour records to which a Verifier should refer. The sample was created after reviewing other samples from protocols widely used in the industry

[SEE TABLE ON PAGE 10 OF VERIFICATION PROTOCOL]

Survey Question:

Do you agree with the proposed sample size taking into account that this is a minimum number?

Yes, I agree with the proposed sample size

No, I do not agree with the proposed sample size. The sample sizes are not sufficient

No, I do not agree with the proposed sample size. The sample sizes are too much

If you selected "No, sample size is not sufficient or too much," please explain the rationale for your proposed sample size:

Comment: FLA recommends a larger sample size to ensure that a representative group of workers can participate in the verification process. Given the wide range of criteria for sampling laid out in the Protocol, the sample sizes might be inadequate to cast a wide enough net for the desired level of diversity. Here is the Sample Size Guidance FLA uses:

1-100 workers: 20 interviews

101-250 workers: 21-30 interviews

251-500 workers: 31-40 interviews

>500 workers: +5 interviews for every additional 500 workers

32. SLCP proto2, 2. Verification protocol. Section 5.3, Worker Interviews, Pages 10-12 (worker engagement)

A critical part of verification is to incorporate employee experiences into an understanding of the validity of assessment data. The interviews are strictly confidential and subsequent reports will not identify the names of interviewees nor their individual responses. [...]

It is important to interview trade union and/or worker representatives, where they exist, to explore their view of working conditions, management attitude as well as any specific issues. It is recommended that the Verifier speak with a worker representative – elected or not (could be trade union rep or elected through internal system, or appointed by the facility) or equivalent at the start of /during the verification process. If the union is independent of the employer, this interview can be an important source of leads on other issues in the facility across the clusters.

Survey Question:

Do you support this proposal to include worker representatives and verify worker engagement approaches by the facility?

Yes, I support the proposal

No, I do not support the proposal - Please state how this can be improved:

OBJECTIVES - VERIFICATION PROTOCOL

33. How well does the verification protocol (element 2 of the SLCP converged assessment framework, proto2) meet each of the following objectives?

Well / Not so well

Adequately ensures that integrity and accuracy of the data collected through the tool and reported by facilities (stage 1 in the SLCP assessment process)

If “Not so well”, please describe how this could be improved:

Specifies procedures and process requirements regarding the verification

If “Not so well”, please describe how this could be improved:

Adequately ensures the qualification of the verifier

If “Not so well”, please describe how this could be improved:

Adequately ensures participation all internal stakeholders in the verification process

If “Not so well”, please describe how this could be improved:

Adequately ensures that the verified report will reflect the reality in the workplace

If “Not so well”, please describe how this could be improved:

Adequately ensures that integrity and accuracy of the data collected through the tool and reported by facilities (stage 1 in the SLCP assessment process)

If “Not so well”, please describe how this could be improved:

34. How satisfied or unsatisfied are you with the current version of the verification protocol (element 2 of the SLCP converged assessment framework, proto2)?

Very Dissatisfied Somewhat Dissatisfied

Neither Satisfied nor
Dissatisfied Somewhat Satisfied Very Satisfied

Please explain your selection and describe your recommendations and/or priority for improvement in the next iteration of the data collection & verification tool:

35. Are there any last comments or feedback you would like to share with the SLCP team for consideration ahead of the next version of the verification protocol (element 2 of the SLCP converged assessment framework, proto2)?

SECTION THREE – VERIFIER GUIDANCE (element 3)

CONTENT - VERIFIER GUIDANCE

36. Please rate your overall satisfaction with the content in the verifier guidance:

Very Dissatisfied Somewhat Dissatisfied Neither Satisfied nor Dissatisfied Somewhat Satisfied Very Satisfied

If rated 2 thumbs or lower, explain why and how this could be improved:

37. Please rate how useful the verifier guidance document is:

Not Useful Somewhat Useful No Opinion Useful Very Useful

If rated 2 thumbs or lower, explain why and how this could be improved:

38. Please rate how clear the verifier guidance document is:

Not Clear / Somewhat Unclear / No Opinion / Clear / Very Clear

If rated 2 thumbs or lower, explain why and how this could be improved:

OBJECTIVES - VERIFIER GUIDANCE

The Verifier Guidance (element 3 of the SLCP converged assessment, proto2) aims to provide instructions and guidance to verifiers to perform the verification and use the data collection & verification tool. Also it gives example questions to illustrate to verifiers how to respond to different kinds of questions, allowing them to extrapolate for the remainder.

39. How well does the verifier guidance meet the following objectives:

- Adequately provides instructions and guidance to verifiers to perform the verification
- Adequately provides instructions and guidance to verifiers to use the data collection & verification tool

Well / Not so well

If “Not so well”, please describe how this could be improved

- Adequately gives example questions to illustrate to verifiers how to respond to different kinds of questions, allowing them to extrapolate for the remainder

If “Not so well”, please describe how this could be improved

CLOSING - VERIFIER GUIDANCE

40. How satisfied or unsatisfied are you with the current version of the verifier guidance (element 3 of the SLCP converged assessment framework, proto2)?

Very Dissatisfied / Somewhat Dissatisfied / Neither Satisfied nor Dissatisfied / Somewhat Satisfied / Very Satisfied

Please explain your selection and describe your recommendations and/or priority for improvement in the next version of the guidance:

41. Are there any last comments or feedback you would like to share with the SLCP team for consideration ahead of the next version of the verifier guidance?

We thank you again for your continued support and participation in this project.
Your time and feedback in completing this survey is much appreciated.

-END OF SURVEY-